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Casualty Insurance Company***

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

HAROLD SHAPIRO,

Plaintiffs,

vs.

PROGRESSIVE CASUALTY INSURANCE  
COMPANY, a foreign corporation; and DOES I  
through X, inclusive,

Defendants.

CASE NO. 2:25-cv-00263-APG-MDC

**STIPULATION AND ORDER FOR DISMISSAL OF EXTRA-CONTRACTUAL  
(BAD FAITH AND PUNITIVE DAMAGES) CLAIMS, WITH PREJUDICE,  
AND REMAND TO NEVADA STATE COURT**

IT IS HEREBY STIPULATED by and between HAROLD SHAPIRO, by and through his counsel of record, JOSHUA ALDABBAGH, ESQ., of the LAW FIRM OF BOLEY & ALDABBAGH, and Defendant, PROGRESSIVE CASUALTY INSURANCE COMPANY, by and through its counsel RYAN L. DENNETT, ESQ., of the law firm of DENNETT WINSPEAR, LLP, that Plaintiffs' claims for extra-contractual (bad faith), punitive damages (including but not limited to Plaintiff's Second and Third Claims for Relief, as well as alleged breach of good faith and fair dealing, and alleged unreasonable and wrongful conduct), and any other claims involving claims beyond any alleged breach of contract, and/or between PROGRESSIVE DIRECT INSURANCE COMPANY, and HAROLD SHAPIRO are hereby dismissed, with prejudice.

In addition, the parties hereto also agree that the total potential value of all of HAROLD SHAPIRO's remaining claims does not exceed \$75,000 and so this matter is appropriate to be

remanded, by agreement, for resolution of the alleged breach of contract claim to Nevada State Court.

Further it is agreed by the parties that Plaintiffs shall amend their complaint (or file a second amended complaint to the amended complaint in Nevada State Court) to correct the identity of the Defendant to UNITED FINANCIAL CASUALTY COMPANY.

Both sides acknowledge that each side will bear their own attorneys' fees and costs as it relates to the litigation incurred in this litigation thus far.

DATED this 26th day of February, 2025.

DATED this 26th day of February, 2025.

**BOLEY u ALDABBAGH, LTD.**

**DENNETT WINSPEAR, LLP**

By /s/ Joshua AlDabbag  
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Casualty Insurance Company***

**ORDER**

UPON STIPULATION OF COUNSEL,

IT IS SO ORDERED:

Dated: February 27, 2025

  
ANDREW P. GORDON  
CHIEF UNITED STATES DISTRICT JUDGE